MR. MONROE: When you were talking about commingling, were you referring to putting exchange service and exchange access traffic on the same trunk or the same trunk group?

MR. D'AMICO: No, I have been to a couple of these hearings, and I just hear these terms, so that's why I want to make sure I don't talk my way into something I'm not really familiar with. But from my understanding, when WorldCom orders access toll connecting trunks, they basically come to Verizon and say, "I want you to provide a facility from this POI to this Verizon tandem." And so under that ordering arrangement, that is an access-provisioned facility.

MR. MONROE: Okay. By saying it's an access-provisioned facility, are you saying that WorldCom is not permitted to order that facility as a UNE-dedicated transport?

MR. D'AMICO: Again, let me back up. If WorldCom wanted to order UNE IOF from its cage back to its switch, it can do that. What I'm not sure of is, are there any restrictions over what can be

put over that UNE IOF.

MR. MONROE: Okay. And I--

MR. D'AMICO: For example, WorldCom ordering access toll connecting trunks, they typically order from the cage into the switch or from their POI, which is their switch into Verizon's switch. In that case that's an access facility.

MR. MONROE: Actually, that's the one I was asking you about, so maybe we don't need to address the other matter.

MR. D'AMICO: Okay.

MR. MONROE: If we are talking about a transport from WorldCom's network, whether it's a co-lo cage or some other place, but from the WorldCom network to Verizon tandem, for the purpose of providing exchange access, is it Verizon's position that WorldCom is not permitted to purchase UNE-dedicated transport for that purpose?

MR. D'AMICO: Again, that circles back to that what I just said. I don't know if there are restrictions on what could go over a UNE IOF.

What I'm saying is when WorldCom orders access toll connecting trunks in today's environment, they are not ordering them as UNE but ordering them as an access facility, and that's why we are charging access.

MR. MONROE: When you say WorldCom is ordering as access facility, are you saying that because WorldCom uses an access service request, or ASR, to order that facility?

MR. D'AMICO: No, because you could order UNE IOF with an ASR. It's the fields that are populated. And also the requirements that go along with the provisioning of the two types of services.

MR. GOYAL: Could I interject one second. To clarify, when WorldCom purchases UNE--access toll connecting trunks currently under the access tariffs, are you talking about WorldCom's provision of local exchange service or provision of interexchange service?

MR. D'AMICO: It would be interexchange service to connect their customers to IXCs through our tandems or access tandems.

MR. GOYAL: Thank you.

MR. MONROE: Your answer confused me. It would be WorldCom's CLEC entity purchasing facilities used to provide exchange access to an interexchange carrier; correct? In other words, you're not talking about WorldCom's interexchange carrier company purchasing access.

MR. D'AMICO: Correct. It would be WorldCom customer dialing whoever the interexchange carrier is. That goes to your WorldCom switch, and they send it over this access toll connecting trunk with OZZ CIC, and it goes to whatever the interexchange carrier is.

MR. MONROE: Okay. But we are talking about WorldCom acting as a CLEC, not as an interexchange carrier.

MR. D'AMICO: Correct.

MR. MONROE: Let's flip the page to page 18 of Verizon 26, and I'm looking at lines 6 and 7. Actually 5, 6 and 7. There you say WorldCom can choose to connect directly to an interexchange carrier and bypass Verizon's access tandem; is that

correct?

MR. D'AMICO: Yes.

MR. MONROE: Is it your position that the local exchange carrier dictates to the interexchange carrier how the interexchange carrier will obtain access? And by that I mean through a tandem or directly to the end office?

MR. D'AMICO: The CLEC dictates that?

MR. MONROE: Well, the local exchange carrier, be it ILEC or CLEC.

MR. D'AMICO: In this example it would be WorldCom that would choose that.

MR. MONROE: But we are talking about WorldCom acting as a CLEC again.

MR. D'AMICO: Sure.

MR. MONROE: So, it's your position that the LEC tells the IXC whether the IXC will obtain access va the tandem or the end office?

MR. D'AMICO: Yes. In other words, WorldCom could go--the CLEC could go to an interexchange carrier and for whatever reason say, "I have a lot of traffic or I just want a direct

connection into that interexchange carrier."

MR. MONROE: And if the interexchange carrier were to say, "No, I don't prefer to do that. I prefer to purchase access services from you at the tandem," you believe that the LEC can more or less dictate that the IXC will obtain access directly to the end office?

MR. D'AMICO: In this case the LEC being WorldCom?

MR. MONROE: Any LEC, WorldCom as a CLEC, yes.

MR. D'AMICO: If an IXC doesn't want to do something, then arrangements have to be worked out. You are either going to subtend our tandem or have a direct connection to that IXC.

MR. MONROE: I understand that, and I'm trying to establish whose option you believe it is, whether it's the option of the LEC or the option of the IXC to determine whether access will be provisioned to the tandem or to the end office.

MR. D'AMICO: I guess I don't know who actually has that call. Either way, Verizon, if

the tandem is--if Verizon's tandem is used, we will switch that traffic.

MR. MONROE: Okay. Well, if we assume for the moment that the election is the interexchange carrier's, then WorldCom doesn't have a choice to connect directly with the interexchange carrier if the interexchange carrier doesn't want to; is that correct?

MR. D'AMICO: If that's the IXC's choice.

MR. MONROE: Okay.

MR. DYGERT: I think we're going to take a quick break.

(Brief recess.)

MR. DYGERT: All right, Mr. Monroe. Whenever you're ready.

MR. MONROE: Thank you. Let's look at issue VI-1(A).

I couldn't find any Verizon direct testimony on this issue; is that right?

MR. EDWARDS: I don't think there is any direct.

MR. MONROE: Let's look at page 10 of your

Verizon rebuttal. That's September 26th, lines 17 through 19. And this is really closely related to an issue we talked about, but you say that--you understand from the mediation that WorldCom doesn't want to use busy line verification and busy line verification interrupt trunks and that that's okay with you. But I think we still have the open issue of whether or not WorldCom could use the network routable codes, or is that okay now?

MR. D'AMICO: I believe that was one issue I was going to check on, but subject to check, yeah.

MR. MONROE: The only thing I'm not sure about with this issue, did Verizon propose any trunk types that are not either agreed to or specifically the topic of another issue? In other words, are there any trunk types that Verizon is asking for in this section that we aren't already agreeing to or that aren't being covered somewhere else? And I don't think there are. I just wanted to make sure.

MR. EDWARDS: I don't think there are

either, Mr. Monroe. They're all being dealt with elsewhere.

MR. MONROE: Okay. I thought that was the case.

Let's move to VI-1(B). If I can point you to page 11 of your August 17th direct, Verizon Exhibit 29, I believe, and I'm looking at lines 18 and 19.

MR. D'AMICO: Does it start with "That is why Verizon must reach some agreement with WorldCom"?

MR. MONROE: No. It starts with, "Yes, though WorldCom has not really articulated the reason. It will not agree to this language." It's the August 17th direct. Actually, that sentence I read is the particular language I'm going to ask you about.

Maybe Mr. Albert, I don't know, but whoever is responsible for it, do you see it?

MR. ALBERT: Yeah, I'm on page 11.

MR. MONROE: Okay. And my question is: Do you think that WorldCom has been deceptive

or--I'm not really sure what you mean by that when you say that WorldCom hasn't articulated the real reason it won't agree to Verizon's language.

MR. ALBERT: I guess there what I was getting at, this is the way we interconnected with each other as long as you have been a CLEC which goes back to 95, and it's also the same way we always interconnected with each other as WorldCom is an IXC. Given the history of how that's always been done, it was unclear to me why that was not sufficient.

MR. MONROE: Then you could say that the real issue is whether or not WorldCom has to order DS3 facilities only where you have an intermediate hub, but do you realize that WorldCom actually objects to the DS3 limitation; is that right?

MR. ALBERT: Well, my understanding of this issue, if you really want to boil it down, is that we are talking about doing multiplexing for breaking the DS1, breaking a number of DS1s up into a DS3, so maybe do the reverse is more common. It's DS3 to DS1 multiplexing, which is where you

will take an input of a single DS3. And then when we provide multiplexing, we break that down into the 28 individual component DS1s.

And the issue here, I think, comes down to where will we do that in our network, and how will we do it? What equipment will we use for it? And the way I understand, not being a lawyer, the way I understand the FCC's rules for multiplexing--I'm not sure if this is in the '96-98 rules or part of the UNE Remand, but I thought we had a requirement that we had to provide multiplexing for CLECs the same way that we do for interexchange carriers.

And what we have proposed in the Interconnection Agreement is the locations where we will do DS3 to DS1 multiplexing. Those are the exact same locations that we have also provided that service for interexchange carriers, and the equipment that we use where we have the right equipment deployed in the network to do DS3 to DS1 multiplexing for multiple carriers, those locations, which are--the tariff terminology is the intermediate hubs and the terminus hubs, we are

willing to provide that multiplexing for CLECs in those same offices using that same equipment that we also do for IXCs.

So, if you want to have like a short description of what are the two main aspects with this issue is the aspect of where you do the multiplexing and what equipment do yo use to do it, and Verizon's position is that we will do it exactly the way we have for IXCs both in terms of the equipment we use and the location in the network where it's available.

MR. MONROE: Okay. When you're talking about doing multiplexing for CLECs, and I realize you said you weren't a lawyer, but is it your understanding under the Act when you're talking about doing multiplexing for CLECs, are you making a distinction between whether the multiplexing is for the purpose of exchanging traffic and/or whether the multiplexing is associated with a UNE purchased by the CLEC like a dedicated transport?

MR. ALBERT: In this particular issue, we are talking about multiplexing in connection with

switched services, which would be interconnection trunks.

MR. MONROE: Exchanging traffic?

MR. ALBERT: Exchanging traffic. So, this is multiplexing involved with the DS1 trunks that originate on Verizon's switch and which terminate on the CLEC switches.

When we were talking a little bit earlier today, I was saying that as far as the physical interface on our switch, both Verizon's switches and CLEC switches, the digital switches that both we and the CLECs use, the physical interface for trunks is a DS1. So, all of the trunk terminations, when they are ordered, when they are provisioned, ultimately get broken back down and terminated on the switches at a DS1 level.

The multiplexing that we are talking about here in connection with those trunks are the cases where the transport may be provided at a DS3 signal, a larger pipe than the DS1, and it's the location and the fashion within Verizon's network, when we break that larger DS3 transport pipe down,

that the CLEC would order, that would be carrying or providing the transport for their DS1 trunks, it's the multiplexing of that DS3 pipe down into the DS1s and where in the network and how in the network we would do that for trunks so that they can be ordered, provisioned and connected to both parties' switches at the physical four-wired DS1 interface.

MR. MONROE: So, we are not--in any of this context we are not talking about multiplexing associated with dedicated transport; is that correct? We are only talking about multiplexing associated with interconnection and traffic exchange.

MR. ALBERT: I would agree we are talking about it with interconnection and traffic exchange. I'm not quite sure when you're throwing the descriptor of dedicated transport around. This is transport that's associated with the switched trunks, so I would not exclude transport from the discussion of what we are dealing with here.

However, this is not transport for UNEs.

MR. MONROE: That's my question.

In your testimony, what you filed and a minute ago, you mentioned both intermediate and terminus hubs; is that right?

MR. ALBERT: That is correct.

MR. MONROE: In your contract language you only mention intermediate hubs, and I'm wondering how those jive. Is it an omission in your contract language?

MR. ALBERT: That sounds like it's not as complete and clear as it could be.

MR. MONROE: If you could take a look at your proposed contract language, I'm looking on the DPL at 174 and 175, and I think the discussion of the intermediate hub is on 175. It's in Section 5.2.1.

MR. ALBERT: If you want, we could add words to that that will also incorporate the terminus hubs.

Just to explain the difference between intermediate hub and terminus hub, if an IXC or CLEC orders multiplexing to a terminus hub, that

means that in that central office that is characterized as a terminus hub, the DS1s that are broken down and multiplexed down from the DS3, they must be connected to a switch located in that central office building. That's what the terminus hub is.

If a Verizon central office is characterized in the tariff as an intermediate hub, and if the CLEC orders multiplexing or the IXC orders multiplexing at the intermediate hub, we would still do the DS3 to DS1 multiplexing in that central office building. However, the resultant DS1s the CLEC may further order transport to take those to a different Verizon end-office destination.

And that's an important point to that distinction because when we are dealing here with the issue of where do we multiplex and how do we multiplex, the impact that's also associated with that is having sufficient interoffice facilities available of Verizon's so that if an office is an intermediate hub, which means we then out of that

hub will transport DS1s further across Verizon's network, it's necessary that there be facilities in place that the network is built that way to be able to accommodate that further interoffice transport out of that location.

One of the problems that we would run into is if a CLEC wanted to have multiplexing done at a Verizon office that was not an intermediate hub, the odds are the DS1s which they would want to take further into Verizon's networks, the DS1s we broke down in that office but ordered further points in that network, the odds are that we would not have the network built with sufficient capacity to handle that further additional type of transport.

So, that's another issue associated with the terminology and with the structure of the offering. It not only relates to do we have equipment in place that can do multiplexing the way we do for the IXCs, but when you get into the aspect of the intermediate hubs it also relates to, is there additional out-of-that-office available transport capacity that can be used to satisfy the

carriers' orders.

MR. MONROE: I think you prefaced that explanation with a comment that you'd add terminus hubs to that language if we wanted you to.

MR. ALBERT: Yeah.

MR. MONROE: I don't know that we do, but I want to clarify what your proposal is.

MR. ALBERT: We would be certainly willing to put that in there.

I mean, it's how we operate together today.

MR. MONROE: Then let me clarify what your position is as far as the language goes. Are you saying that we can never interconnect at a higher rate than a DS3?

MR. ALBERT: No, I guess we don't today. I think in our Interconnection Agreement we basically propose the process that the parties would use, if a CLEC would like a new and different type of interconnection than currently exists that currently could be ordered and operated maintained, and known how to do it.

So, in our Interconnection Agreements, there's a process called the "Bona Fide Request Process," which basically details out the steps the two parties would go through together to define new types of arrangements, new means to access UNEs.

And it's a process that lets the parties work together to basically define in detail a new thing, and then to further develop the specifications associated with that, and then for further verification to then work through, if it's technically feasible to do it, and what would be involved with developing it, and what the costs would be, what the time frames would be as well as the operational considerations, and to work with the CLEC on those types of requests for new things.

And if we are talking interconnection for trunks, which is what these issues are dealing with, there are two ways today in terms of the physical interface that the CLEC can order those. They can order a straight DS1 pipe from their switch to our switch, same way IXCs do and everybody else. The CLEC can also order a DS3 with

multiplexing. I think in our testimony I might have used the jargon of a MUXed DS3, and that's shorthand for a DS3 that a carrier would order which very specifically would be ordered for the purpose of connecting the 28 component DS1s that rode on that DS3 up to Verizon's switches for the purposes of connecting trunks.

So, the two types of physical interfaces for trunks, it's the direct DS1s--CLEC can order them that way--or they could order the MUX DS3 which, in essence, when they order that jargon, they are multiplexing from us in addition to the further DS1 transport beyond the multiplexing. And those are the two ways today that exist, and the level of ordering and the operations processes and procedures for interconnection trunks. Anything beyond and above that a CLEC would be interested in, we would certainly work with you to define what you wanted through the BFR process.

MR. MONROE: Well, some of the things you just said confused me a bit compared to where I thought we were after the mediation on this, and I

tried to clarify it there, but I'm not sure I succeeded.

When we are talking about this interconnection here, and we are referring to the interface, are you referring to the interface of the transmission facilities, or are you referring to the trunk interface?

MR. ALBERT: These are the interfaces on the switches. And the way those are ordered today, part of the two ways I described, either a straight DS1 or the jargon MUXed DS3, which, in turn, that has a quantity of different DS1s that will break down and then take off to the switch the CLEC orders into.

MR. MONROE: So, this has absolutely nothing to do with the rate of the transmission facilities? Let me give you an example before you answer that.

This language wouldn't preclude the parties from having a fiber meet running at OC3 or OC48; is that correct?

MR. ALBERT: No. This would not preclude

a mid-span meet between ourselves. This really gets to how the CLEC or an IXC orders trunks and how we, in turn, provision those trunks.

MR. MONROE: All right.

MR. ALBERT: Which relates back to the transport.

MR. GOYAL: Just to clarify that, in the situation where there is a fiber mid-span meet arrangement used, would this language still apply with respect to the ordering of trunks over that mid-span meet?

MR. ALBERT: Yes.

MR. GOYAL: Thank you.

MR. ALBERT: There would be additional transport facilities that would have to be pieced together both by the CLEC as well as ourselves to provide the end-to-end interoffice facility circuits that would be used. But a portion of that overall circuit would still be riding on the mid-span meet.

MR. GOYAL: Does that essentially mean that a mid-span meet can only be constructed at the

NECA 4 intermediate hub or terminus hub locations?

MR. ALBERT: No.

MR. GOYAL: How would interconnection trunks between the NECA 4 locations and the mid-span fiber meet be established?

MR. ALBERT: The carrier has two ways, once the mid-span meets is built, that they can then order trunks to our switches, their switch on the other end, that would ride across the mid-span meet. They either can send us an ASR for DS1, which would specify the switches. They could send that for multiple DS1s if they want a trunk group that is larger. The other way that they could order is they could send us an order for a MUXed DS3, which means they are buying DS3 from us, as well as they also are buying multiplexing.

And as part of that MUXed DS3 ASR, that then will get into also specifying the individual DS1s that ride on it, including which Verizon end-office switch those particular DS1s would be directed to.

MR. GOYAL: Sorry for the interruption.

MR. MONROE: That's fine.

Let's talk about an example where WorldCom wants to have a fiber meet with Verizon at a switching location that is not an intermediate or a terminus hub, okay? You understand that scenario?

MR. ALBERT: Keep going.

MR. MONROE: Okay.

MR. ALBERT: You mean one end of the mid-span meet?

MR. MONROE: One end is the WorldCom switch, and the other end is at a Verizon location that is not an intermediate or terminus hub.

MR. ALBERT: Okay.

MR. MONROE: Before I go on, is that doable?

MR. ALBERT: Yes.

For billing the mid-span meet? Yes, that's doable.

MR. MONROE: Yes, and we will assume that we have agreed on how we are going to do the mid-span meet, so put aside any issues that might be associated with that. And we will say that that

mid-span meet is at some OC level, OC3 or OC12 or something like that.

How do we get from that OC level down to a T-1 level for the switch interface, when it comes time to order trunks that are going to go into the switch at that location of the Verizon side?

MR. ALBERT: What do you mean, how you get from?

MR. MONROE: We will assume that we are coming into the Verizon location on the fiber at OC12. Somehow we are getting from that rate to a T-1 rate when we order a T-1 trunk interface into the Verizon switch; is that right?

MR. ALBERT: (Witness nods head.)

MR. MONROE: How is that accomplished?

MR. ALBERT: You would order that as a DS1, and then basically coming out of the mid-span meet it would be up to Verizon to transport that the rest of the way to its end office and break it down when it gets there.

MR. MONROE: Okay. And my particular scenario assumed that the Verizon end office was at